

# Invoice

FROM:  
John J.D. McFerrin-  
Clancy, Esq.  
17 State Street  
40th Floor  
New York, New York 10004  
(646) 771-7377

TO:  
Crisisrisk  
492 Old Sackett Road  
Rock Hill, New York 12555  
Terms



207  
Rekor  
Feb 4, 2020  
Upon Receipt

## FEES & EXPENSES

DATE		DESCRIPTION	RATE	TOTAL
01/06/20	Fee	Call w/opposing counsel re: entry into case, extension of deadlines [.25]; call w/R. Boneberg re: same, significance of change of Rekor counsel [.25]	\$550.00 x 0.50	\$275.00
01/07/20	Fee	[REDACTED]	\$550.00 x 0.20	[REDACTED]
01/17/20	Fee	Call w/ R. Boneberg re: other sides second amended complaint, whether to consent, tactical considerations re: same, motion practice	\$550.00 x 0.50	\$275.00
01/22/20	Fee	Review Rekor's opposition to our fee motion	\$550.00 x 0.75	\$412.50
01/28/20	Fee	Review judge's individual rules, form discovery order and Rule 16 and 26 to prepare position for joint status letter and meet and confer with opponents/conference [.3]; call w/R. Boneberg re: joint letter, our position on discovery and motion schedule, tactical considerations re: same [1.25]	\$550.00 x 1.55	\$852.50
02/01/20	Fee	Review emails between R. Boneberg and clients re: discovery issues, development of issue/fact outline, and possibility of another Rule 11 motion	\$550.00 x 0.25	\$137.50
02/03/20	Fee	Review draft of first set of interrogatories to plaintiff [.5]; review preservation notice letter [.2]; call with opposing counsel and R. Boneberg re: pre-conference deadlines/schedule, motion practice [.5];	\$550.00 x 1.20	\$660.00
02/04/20	Fee	Call w/Transperfect, R. Boneberg and clients re: process of collecting, reviewing, producing electronic discovery [1.5]; call with R. Boneberg, clients re: follow up [.5]; review and revise mandatory "joint letter" on scheduling, discovery [1]; review case management order prepared with input from plaintiff [1]; call and email w/R. Boneberg re: reassignment of case to Judge Liman [.25]	\$550.00 x 4.25	\$2,337.50
02/05/20	Fee	Review order from Judge Liman on conference [.2]; emails and calls w/R. Boneberg, other side, re: whether case has been transferred to Liman or not [.25]	\$550.00 x 0.45	\$247.50
02/06/20	Fee	Review email exchange with client re: franchisee and emails destruction issues [.25]; call and email with R. Boneberg re: same, confirmation of transfer of case to Liman, Transperfect SOW [.5]	\$550.00 x 0.75	\$412.50
02/07/20	Fee	Review emails between R. Boneberg and clients re: facts/witnesses re: Georgia serve[.2]r ; [REDACTED]	\$550.00 x 0.30	\$165.00
02/09/20	Fee	Review R. Boneberg letter to judge re: extension of schedule [.2]; review R. Boneberg emails w/clients re: status/access to their Rekor emails [.2]	\$550.00 x 0.40	\$220.00
02/10/20	Fee	[REDACTED], review email from plaintiff re: new requirements for Liman's case management order [.25]	\$550.00 x 0.75	\$412.50
02/11/20	Fee	Review revised joint letter to judge re: scheduling, pre-conference information required	\$550.00 x 0.40	\$220.00

DATE		DESCRIPTION	RATE	TOTAL
04/24/20	Fee	Review and finalize fifth document request	\$550.00	\$825.00
John McFerrin-Clancy			x 1.50	
04/30/20	Fee	[REDACTED]	\$550.00	\$275.00
John McFerrin-Clancy			x 0.50	
05/01/20	Fee	Review and finalize sixth document request [1.5]; [REDACTED]	\$550.00	\$1,815.00
John McFerrin-Clancy		[REDACTED] view	x 3.30	
		scheduling letter on 12(c) briefing from Rekor [.25]		
05/05/20	Fee	[REDACTED]	\$550.00	\$220.00
John McFerrin-Clancy			x 0.40	
05/08/20	Fee	[REDACTED] review Rekor discovery	\$550.00	\$1,457.50
John McFerrin-Clancy		dispute letters re: interrogatory responses [.5]	x 2.65	
05/12/20	Fee	Review and revise response to Rekor letter on discovery objections [1.25]; call w/R. Boneberg re: same, meet and confer coming up [.8]	\$550.00	\$1,127.50
John McFerrin-Clancy			x 2.05	
05/14/20	Fee	Review Rekor's responses and objections to second document demand	\$550.00	\$330.00
John McFerrin-Clancy			x 0.60	
05/16/20	Fee	Review and comment on proposed letter to judge re: failure to rule on motions [.3]; review and substantial revisions to draft responses to request to admit [4]; call w/R. Boneberg re: all [.7]	\$550.00	\$2,750.00
John McFerrin-Clancy			x 5.00	
05/17/20	Fee	Review and revise response to Rekor interrogatories [1]; call w/R. Boneberg re: same [.3]	\$550.00	\$715.00
John McFerrin-Clancy			x 1.30	
05/18/20	Fee	Review and revise response to request to admit [1]; review our response to first document request [1]; review discovery dispute letter from Rekor [.4]; review Rekor's responses and objections to our second set of interrogatories [.3]	\$550.00	\$1,485.00
John McFerrin-Clancy			x 2.70	
05/19/20	Fee	Call w/R. Boneberg to prep for meet and confer [.1]; telephonic meet and confer [.7]; follow up call w/R. Boneberg [.25]; revise responses to first set of interrogatories [.5]	\$550.00	\$880.00
John McFerrin-Clancy			x 1.60	
05/21/20	Fee	review and comment on draft letter to Rekor on follow up issue from meet and confer [.5]; review Rekor's responses and objections to our third document request [.4]	\$550.00	\$495.00
John McFerrin-Clancy			x 0.90	
05/22/20	Fee	Further revise responses and objections to requests to admit [2]; calls w/R. Boneberg re: same [.5]	\$550.00	\$1,375.00
John McFerrin-Clancy			x 2.50	
05/26/20	Fee	Revise and finalize response to interrogatories, response to requests to admit and response to first document demand [2.5]; call w/ R. Boneberg re: same [.25]	\$550.00	\$1,512.50
John McFerrin-Clancy			x 2.75	
06/05/20	Fee	Review cases from R. Boneberg re: parallel claims for fraud and contract [.75]; call w/R. Boneberg re: same, dismissal stipulation [.3]	\$550.00	\$577.50
John McFerrin-Clancy			x 1.05	
06/11/20	Fee	Review Rekor's responses and objections to our fourth, fifth and sixth document requests [1.5]; call w/R. Boneberg re: same, meet and confer process [.75]	\$550.00	\$1,237.50
John McFerrin-Clancy			x 2.25	
06/16/20	Fee	Reviewed and marked up our discovery dispute letter to Rekor [1]; reviewed Rekor discovery letter to us [1.5]; call w/R. Boneberg re: same, plan for meet and confer [.3]	\$550.00	\$1,540.00
John McFerrin-Clancy			x 2.80	
06/18/20	Fee	Review Biebart case cited by Rekor, research case history [.6]; call w/R. Boneberg going over Rekor discovery letter and our response for meet and confer [.6]	\$550.00	\$660.00
John McFerrin-Clancy			x 1.20	
06/19/20	Fee	Meet and confer call with Rekor and R. Boneberg [1.5]; call w/R. Boneberg to follow up [.1]	\$550.00	\$880.00
John McFerrin-Clancy			x 1.60	
06/22/20	Fee	Review, revise and finalize reply brief on 12(c) motion [2]; call w/R. Boneberg re: same, next set of interrogatories [.1]	\$550.00	\$1,155.00
John McFerrin-Clancy			x 2.10	

DATE		DESCRIPTION	RATE	TOTAL
02/13/20	Fee	Review recent emails from client re: document "destruction" claim [.2]; call w/ R. Boneberg about how to escalate possible spoliation/meritless issue on computer claim, next steps procedurally [.5]	\$550.00 x 0.70	\$385.00
02/17/20	Fee	Answered research questions for R. Boneberg re: issue in reply on fee motion and emails w/ R. Boneberg re: same [3]	\$550.00 x 3.00	\$1,650.00
02/20/20	Fee	Reviewed and finalized reply brief and affidavit on fee motion [2]; call w/R. Boneberg on reply, answer, 26(a) disclosures, electronic discovery document requests [.75]	\$550.00 x 2.75	\$1,512.50
02/25/20	Fee	Review and finalize first document demand re: Georgia server [1]	\$550.00 x 1.00	\$550.00
02/27/20	Fee	Review, revise and finalize answer to second amended complaint, emails w/R. Boneberg re: same [1.5]	\$550.00 x 1.50	\$825.00
02/28/20	Fee	Revise and finalize answer to second amended complaint [2]	\$550.00 x 2.00	\$1,100.00
03/03/20	Expense	Prepare hard copies of fee motion papers to judge (per judge's rules), with copy to R. Boneberg and JMC	\$477.97 x 1.00	\$477.97
03/03/20	Fee	Review and revise first set of interrogatories [1.5]; call w/R. Boneberg re: interrogatories, 26(a) disclosures [.3]	\$550.00 x 1.80	\$990.00
03/04/20	Fee	Finalize first set of interrogatories [.5]	\$550.00 x 0.50	\$275.00
03/16/20	Fee	Review Rule 26(a) disclosures, revise and finalize same, emails w/R. Boneberg re: same [2]	\$550.00 x 2.00	\$1,100.00
03/17/20	Fee	Review initial Rule 26(a) disclosures from Rekor	\$550.00 x 0.60	\$330.00
03/26/20	Fee	Review Rekor's responses and objections to first document demand [.5]; email w/R. Boneberg re: follow up points to Rekor [.25]	\$550.00 x 0.75	\$412.50
03/30/20	Fee	[REDACTED]	\$550.00 x 2.10	\$1,155.00
04/01/20	Fee	[REDACTED]	\$550.00 x 0.80	\$440.00
04/02/20	Fee	[REDACTED] review Rekor's responses and objections to first interrogatories [.5]; call [REDACTED]	\$550.00 x 0.85	\$467.50
04/06/20	Fee	[REDACTED]	\$550.00 x 0.75	\$412.50
04/07/20	Fee	Research on timing of defendant's answer [1]; call w/R. Boneberg re: same [.2]	\$550.00 x 1.20	\$660.00
04/14/20	Fee	Review and finalize our second set of interrogatories [1]; review and finalize our second document demand [1]	\$550.00 x 2.00	\$1,100.00
04/15/20	Fee	Review, revise and finalize new 12(c) motion papers [3]; draft notice of motion for same [.25]	\$550.00 x 3.25	\$1,787.50
04/16/20	Fee	Review and finalize third document demand [1]; Calls w/R. Boneberg re: date for Rekor's answer to counterclaims, our next steps, timing [.8]	\$550.00 x 1.80	\$990.00
04/20/20	Fee	Review Rekor's first interrogatories, demand for documents and requests to admit [2.5]	\$550.00 x 2.50	\$1,375.00
04/21/20	Fee	Review and finalize our third set of interrogatories [1] and fourth document request [1]	\$550.00 x 2.00	\$1,100.00
04/22/20	Fee	Review Rekor answer to counterclaims [2]; call w/R. Boneberg re: same, next steps [.25]	\$550.00 x 2.25	\$1,237.50

DATE		DESCRIPTION	RATE	TOTAL
06/24/20	Fee	Meet and confer call w/Rekor and R. Boneberg [2.2]; follow on call w/ R. Boneberg [.1]	\$550.00 x 2.30	\$1,265.00
06/27/20	Fee	[REDACTED]	\$550.00 x 1.50	\$825.00
06/29/20	Fee	[REDACTED]	\$550.00 x 1.25	\$687.50

My wire instructions are:

Fees

Expenses

Total

Swiftcode/Routing: Citi US 33

Account type: CB Streamlined Checking

Account holder: John J.D. McFerrin-Clancy, Esq.

Account number: [REDACTED]

Unchanged hours - 56

Citibank Routing No.: [REDACTED]

Citibank

181 Montague Street

Brooklyn, New York 11201

[REDACTED] — ~~11.15~~ 6.75

— 0.80

[REDACTED] — 7.45

[REDACTED] — 1.70

[REDACTED] — 6.55

**ROBERT C. BONEBERG, ESQUIRE**

43 Madison Avenue  
 Maplewood, New Jersey 07040  
 (973) 886-6576 (c)  
 bonebergesquire@gmail.com

2/3/2020

To: Suzanne Loughlin  
 Harry Rhulen  
 James Satterfield

Rekor Systems v Loughlin, et al.  
 Total Amount due: [REDACTED]

<u>Date</u>	<u>Time</u>	<u>Activity</u>
1/2/20	.7	Tel. Conf. w/ J. Satterfield re: strategy and franchises (.7)
1/6/20	1.9	Tel. Conf. w/ J. McFerrin-Clancy, K. Fleischman, and J. Glatter re: settlement (.5), Tel. Conf. w/ Court Chambers re: schedule (NC), Tel. Conf. w/ J. McFerrin-Clancy re: strategy (.3), Report to clients on calls (NC), Tel. Conf. w/ clients re: strategy (1.1)
1/7/20	1.5	Review PRA (.3), Tel. Confs. w/ H. Rhulen and S. Loughlin re: settlement (.8), Tel. Conf. w/ J. McFerrin-Clancy re: settlement (.2), Tel. Conf. w/ K. Fleischman re: settlement (.2), report to clients on calls (NC)
1/16/20	1.2	Tel. Conf. w/ J. Glatter re: case schedule and 2 <sup>nd</sup> amended complaint, legal research re: amended pleadings, report to clients (1.2)
1/17/20	3.1	<b>Legal Research re: Computer Fraud &amp; Abuse Act (.7)</b> , Tel. Confs. w/ J. McFerrin-Clancy re: amended pleading and case schedule (.5), Tel. Confs. w/ J. Glatter & K. Fleischman re: amended pleading and case schedule (.5), Tel. Confs. w/ H. Rhulen re: amended complaint and case schedule (1.4), E-mails w/clients re: amendment and schedule (NC)
1/18/20	1.0	E-mails w/ clients re: depositions and computer fraud claims (.3), Tel. Confs. w/ H. Rhulen re: amended complaint, computer fraud claims, and strategy (.7)
1/21/20	.8	E-mail and Tel. Conf. w/ M. Eaton re: electronic discovery (.5),

Page 2

		E-mails w/ clients re: discovery and case schedule (.3)
1/22/20	2.3	Tel. Conf. w/ M. Eaton re: electronic discovery (.6) Tel. Conf. w/ J. McFerrin-Clancy re: discovery and case strategy (.5), E-mails w/ clients re: discovery and case strategy (.3), Tel. Conf. w/ J. Satterfield and H. Rhulen re: discovery and case strategy (.9)
1/24/19	1.1	Review Fee motion opposition (1.0), Tel. Conf. w/ J. Glatter re: case schedule (.1)
1/25/20	.8	Legal research re: Rekor cases opposing fee motion (.8)
1/27/20	2.0	E-mails w/ J. Glatter re: case schedule (.2), Review documents and work on mandatory disclosure witness list and related e-mail to clients (1.8)
1/28/20	1.6	Tel. Conf. and e-mails w/ J. Glatter re: case schedule and review draft letter to Court (.3), Tel. Conf. w/ J. McFerrin-Clancy re: mandatory court scheduling submissions (1.3)
1/29/20	3.2	Draft interrogatories (2.0), E-mail w/ J. Glatter re: 2 <sup>nd</sup> amended complaint (NC), E-mails w/ clients and Transperfect re: conference call (NC), Review Rule 12 (c) motion memorandum (.2), Review draft 2 <sup>nd</sup> amended complaint (1.0), Tel. Conf. w/ J. McFerrin-Clancy re: draft 2 <sup>nd</sup> amended complaint (NC)
1/30/20	3.8	Tel. Conf. w/ H. Rhulen re: computer claims and answer (.5), E-mails w/ clients re: computer hacking (NC), Tel. Conf. w/ clients re: draft 2 <sup>nd</sup> amended complaint and new claims (1.3), Tel. Conf. w/ J. McFerrin-Clancy re: draft 2 <sup>nd</sup> amended complaint (.5), Legal research re: Computer Fraud & Abuse Act (.3), Legal research re: Rekor cases on fee motion (1.2)
1/31/20	2.3	E-mails w/ J. Glatter, J. McFerrin-Clancy, and H. Rhulen re: discovery issues (.8), work on answer to new complaint (1.5)

Unchanged Hours - 19.5

— 1.5

— 2.1

— 3.3

**ROBERT C. BONEBERG, ESQUIRE**

43 Madison Avenue  
 Maplewood, New Jersey 07040  
 (973) 886-6576 (c)  
 bonebergesquire@gmail.com

3/2/2020

To: Suzanne Loughlin  
 Harry Rhulen  
 James Satterfield

Rekor Systems v Loughlin, et al.  
 Total Amount due: [REDACTED]

<u>Date</u>	<u>Time</u>	<u>Activity</u>
2/1/20	1.0	Numerous e-mails w/ clients re: case strategy (NC)
2/3/20	2.6	Tel. Conf. w/ Rekor attorneys re: joint submission (.6), Tel. Conf. w/ J. McFerrin-Clancy re: joint submission (NC), E-mails w/ clients re: discovery (NC), Tel. Conf. w/ H. Rhulen re: discovery (.5), Edit interrogatories (.8), Draft joint letter to Court (.7), E-mails w/ J. Satterfield re: personal claim (NC)
2/4/20	6.3	Edit joint letter to Court and related Tel. Confs. w/ J. McFerrin-Clancy and clients (3.8), Tel. Confs. w/ Transperfect, J. McFerrin-Clancy, and clients re: electronic discovery (2.5), Review new judge notice and rules, and related e-mails to Clients and J. Glatter (NC)
2/5/20	5.4	Attend to e-mails and Tel. Conf. w/ J. McFerrin-Clancy re: case transfer (.3), <b>Draft answer and related analysis of new complaint (3.5)</b> , Edit interrogatories and send to clients (.4), Tel. Confs. w/ H. Rhulen and S. Loughlin re: discovery and case strategy (1.2)
2/6/20	5.3	Tel. Conf. w/ J. Glatter and Court Chambers re: new judge, and related e-mails (.2), <b>Tel. Conf. w/ J. Satterfield re: deleted e-mails and case strategy (.7)</b> , draft answer (3.0), Legal research re: personal jurisdiction (1.4)
2/7/20	1.9	Tel. Confs. w/ clients and J. McFerrin-Clancy re: discovery and Strategy (.1.4), Numerous e-mails w/ clients re: discovery and answer to new complaint (.5)

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2//8/20	1.8	Legal research re: spoliation (.8), work on e-mail deletion and preservation claims (1.0)
2/9/20	2.8	Work on e-mail and jurisdiction issues, review Rekor SEC filings, and review related e-mails from clients (2.0), Draft extension letter to Judge (1.0)
2/10/20	6.2	Edit and submit extension letter to Judge (.3), Edit pre-conference joint submission (.7), legal research re: personal jurisdiction (1.0), [REDACTED] Edit answer (2.5), Tel. Confs. w/ H. Rhulen and J. Satterfield re: e-mail deletion and Rekor director NY activities (1.4), E-mails w/ clients and M. Eaton re: electronic discovery (NC)
2/11/20	2.5	Tel. Conf. w/ H. Rhulen re: e-mail issues and Rekor director NY activity (.5), Edit answer (2.0)
2/12/20	4.4	Edit and file status letter (.4), Draft discovery demand (1.0), Edit answer (3.0)
2/13/20	6.9	Legal research for fee reply brief and review Rekor brief (4.0), Tel. Confs. w/ H. Rhulen re: discovery, case strategy, and Firestorm documents (2.1), Tel. Conf. w/ J. McFerrin-Clancy re: discovery (.5), Edit discovery demand (.2), E-mail w/ J. Glatter re: discovery (.1), E-mails w/ clients re: discovery (NC)
2/14/20	4.7	Legal research re: effect of amended pleading (.3), Legal research re: advancement of fees (.8), Edit reply brief (2.5), E-mails w/ clients re: pre-closing disclosures and review attachments (.4), Tel. Conf. w/ J. McFerrin-Clancy re: discovery (NC), Tel. Confs. w/ H. Rhulen re: pre-closing disclosures and strategy (.7)
2/15/20	1.9	Legal research re: advancement cases and review related cases for reply brief (1.9)
2/16/20	8.0	Draft and edit reply memorandum for fee motion (8.0)
2/17/20	1.8	Edit reply memorandum for fee motion (1.5), Tel. Conf. w/ J. McFerrin-Clancy re: fee motion and case (.3), Tel. Conf. w/ S. Loughlin re: reply memorandum (NC), Attention to e-mails re: Atlanta server (NC)
2/18/20	8.0	Final edit and Shepardize reply memorandum (3.5), Edit document demand (1.5), Edit answer (2.0), Legal research re: Computer

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**Fraud & Abuse Act (1.0)**

2/19/20	5.2	Tel. Confs. w/ H. Rhulen and S. Loughlin re: Insurance coverage, discovery strategy, Rekor Corporate policies, and answer (1.5), <b>edit answer (3.0)</b> , Legal research re: personal jurisdiction (.7)
2/20/20	5.3	Tel. Conf. w/ S. Loughlin re: warrants (NC), E-mails w/ J. Glatter re: Rule 26 (a) disclosure (NC), Legal research re: personal jurisdiction (2.0), <b>Edit answer and review related documents (3.0)</b> , Tel. Conf. w/ J. McFerrin-Clancy re: discovery, fee motion, and answer (.3)
2/21/20	4.8	Tel. Conf. w/ H. Rhulen and J. Satterfield re: counterclaims (.5), File reply papers w/ Court and report to clients (1.0), Edit production demand and interrogatories (.3), Edit counterclaims (3.0)
2/22/20	1.3	Edit counterclaims (1.0), edit production demand and interrogatories (.3)
2/23/20	.5	Edit counterclaims (.5)
2/24/20	3.5	Edit counterclaims and send to clients (3.5)
2/25/20	5.8	Edit and serve demand for production (.5), Tel. Conf. w/ J. McFerrin-Clancy re: discovery and counterclaims (.3), Tel. Conf. w/ S. Loughlin re: counterclaims (NC), Edit counterclaims and report to clients (5.0)
2/26/20	3.0	Edit counterclaims and related Tel. Conf. w/ H. Rhulen and S. Loughlin (3.0)
2/28/20	<u>.4</u>	<b>Filed answer and exhibits and related Tel. Conf. w/ J. McFerrin-Clancy (.4)</b>

**[REDACTED]** Unchanged Hours — **[REDACTED]** ~~10.3~~ 40.3

**[REDACTED]** — 17.2

**[REDACTED]** — 3.5

**[REDACTED]** — 22.5

**[REDACTED]** — 16.5

**ROBERT C. BONEBERG, ESQUIRE**

43 Madison Avenue  
 Maplewood, New Jersey 07040  
 (973) 886-6576 (c)  
 bonebergesquire@gmail.com

4/1/2020

To: Suzanne Loughlin  
 Harry Rhulen  
 James Satterfield

Rekor Systems v Loughlin, et al.  
 Total Amount due [REDACTED]

<u>Date</u>	<u>Time</u>	<u>Activity</u>
3/2/20	1.0	Edit interrogatories and 12 (c) memorandum (1.0)
3/4/20	.5	Finalize and serve First Set of Interrogatories (.5)
3/5/20	1.5	Edit 12 (c) memorandum (1.5)
3/6/20	1.0	Draft Rule 26 (a) disclosure (1.0)
3/8/20	1.0	Draft Rule 26 (a) disclosure (1.0)
3/9/20	2.0	Draft Rule 26 (a) disclosure (2.0)
3/10/20	2.0	Edit and send Rule 26 (a) disclosure to clients (2.0)
3/11/20	1.4	Tel. Conf. w/ H. Rhulen re: Rule 26 (a) disclosure and warrant Instruments (1.0), Edit 12 (c) memorandum (.4)
3/12/20	.3	Edit Rule 26 (a) disclosure and send to clients
3/14/20	1.6	Edit Rule 26 (a) disclosure (.2), E-mails w/ J. McFerrin-Clancy And clients re: Rule 26 (a) disclosure (.4), Tel. Conf. w/ H. Rhulen re: Rule 26 (a) disclosure (1.0)
3/15/20	.8	Edit 12 (c) memorandum (.8)
3/16/20	2.7	Final edit or Rule 26 (a) disclosure and related e-mails w/ Clients, J. McFerrin-Clancy, and J. Glatter (2.7), Tel. Conf. w/ H. Rhulen re: Rule 26 (a) disclosure (NC)

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3/17/20	1.4	Edit, finalize, and serve Rule 26 (a) disclosure and related e-mails (.6), Tel. Conf. w/ J. Satterfield and H. Rhulen re: Rule 26 (a) disclosure (.8)
3/18/20	1.4	Review Rekor SEC filings for 12 (c) motion (.5), Tel. Conf. w/ J. Satterfield and H. Rhulen re: Rekor 26 (a) disclosure (.7), Tel. Conf. w/ J. Boyd re: Firestorm Roswell, GA office (.2)
3/19/20	3.0	Edit 12 (c) memorandum and related research re: Rekor SEC filings (3.0)
3/20/20	3.7	Edit 12 (c) memorandum and report to clients (3.7)
3/22/20	.5	Legal research re: judicial notice (.5)
3/23/20	2.8	Legal research re: judicial notice (.3), Tel. Conf. w/ H. Rhulen re: discovery and missing computer (NC), Edit 12 (c) memorandum and declaration (2.0), Review J. Park e-mail and related Tel. Conf. w/ J. McFerrin-Clancy re: discovery issues (.5)
3/24/20	1.9	Edit 12 (c) memorandum and download exhibits from SDNY (1.5), Draft and send e-mail to J. Park re: interrogatories and related Tel. Conf. w/ J. McFerrin-Clancy (.4)
3/25/20	2.7	Edit 12 (c) memorandum (2.5), E-mail w/ J. McFerrin-Clancy Re: 12 (c) motion (.2)
3/26/20	2.9	Edit 12 (c) memorandum (1.0), Tel. Conf. w/ J. Satterfield and H. Rhulen re: discovery and strategy (.9), Review Rule 26 (a) disclosure, draft e-mail to K. Fleischman, and send e-mail to J. McFerrin-Clancy (1.0)
3/27/20	NC	Edit and send e-mail to K. Fleischman re: disclosure issues (NC)
3/29/30	NC	Attention to e-mails with K. Fleischman and clients re: discovery Issues (NC)
3/30/20	1.3	Tel. Conf. w/ H. Rhulen re: motion to dismiss (.5), Legal research re: Rule 41 dismissal (.5), Review motion to dismiss (.3)

Page 3

3/31/20

3.0

Review motion to dismiss (1.0), [REDACTED]  
[REDACTED], Tel. Conf. w/  
H. Rhulen re: case strategy (NC)

[REDACTED]

Unchanged Hours - 20.5  
[REDACTED] - 17.9

**ROBERT C. BONEBERG, ESQUIRE**

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 (973) 886-6576 (c)  
 bonebergesquire@gmail.com

5/1/2020

To: Suzanne Loughlin  
 Harry Rhulen  
 James Satterfield

Rekor Systems v Loughlin, et al.  
 Total Amount due: [REDACTED]

<u>Date</u>	<u>Time</u>	<u>Activity</u>
4/1/20	2.6	Draft stipulation and order (.4), Tel. Conf. w/ J. McFerrin-Clancy re: strategy (.7), Tel. Conf. w/ Clients re: strategy (1.1), [REDACTED]
4/2/20	3.3	Edit 12 (c) motion (1.0), Review Rekor interrogatory responses (.3), Send proposed stipulation to K. Fleischman, related e-mails w/ K. Fleischman and clients, and related Tel. Confs. w/ clients and J. McFerrin-Clancy (2.0)
4/3/20	1.3	Draft Document demand and related e-mails w/ clients (.6), Leg. Res. re: Rule 34 (.3), Download SEC filings (.4), Follow up w/ J. Boyd re: Atlanta office (NC), Tel. Conf. w/ H. Rhulen re: disclosure (NC)
4/4/20	.7	Edit Doc. Demand and related e-mails w/ clients (.5), Leg. Res. re: Rule 34 and missing documents
4/6/20	3.3	Edit and file Notice of Dismissal (.5), Leg. Res. Rule 12 (b) and Rule 41 (.6), Tel. Confs. w/ clients and J. McFerrin-Clancy re: Dismissal and strategy, and related e-mails w/ clients and K. Fleischman (2.0), Edit Doc. Demand (.2)
4/7/20	3.2	Review Clerk filing and send to clients (.2), Leg. Res. re: Rule 12 (b) time extension and related Tel. Conf. w/ J. McFerrin-Clancy (.5), Edit 12 (c) memorandum and declaration, review related SEC filings, transmit to J. McFerrin-Clancy (2.5)
4/8/20	2.5	[REDACTED], Edit Doc. Demand and

Page 2

interrogatories (1.3), Tel. Conf. w/ H. Rhulen re: discovery (NC)

4/9/20 4.2 [REDACTED] Status report to clients (NC),  
[REDACTED]  
[REDACTED]

4/10/20 2.1 Edit 12 (c) memorandum and related Leg. Res. (.5), [REDACTED]  
[REDACTED] Review Rekor 10-K and related  
e-mails w/ clients re: Rekor practices (.3)

4/12/20 .5 [REDACTED]

4/13/20 2.5 Draft and edit 3<sup>rd</sup> Doc. Demand (.5), [REDACTED]  
[REDACTED] Tel. Conf. w/ H.  
Rhulen re: discovery and claims (.3)

4/14/20 2.0 Edit and serve 2<sup>nd</sup> Doc. Demand and edit 3<sup>rd</sup> Doc. Demand (1.0),  
[REDACTED] Tel. Conf. w/ S. Loughlin re: Rekor  
board practices (NC)

4/15/20 2.7 Edit 12 (c) memorandum (.2), E-mails w/ M. Eaton re: electronic  
discovery (NC), Edit 3<sup>rd</sup> Doc. Demand and draft 4<sup>th</sup> Doc.  
Demand (2.0), [REDACTED]

4/16/20 3.5 Finalize and serve 2<sup>nd</sup> Interrogatories and 4<sup>th</sup> Doc. Demand (2.0),  
Tel. Conf. w/ H. Rhulen re: disclosure and strategy (.6), Tel. Conf.  
w/ K. Fleischman and J. Glatter re: answer schedule and report  
to clients (.2), Tel. Conf. w/ J. McFerrin-Clancy re: strategy (.7)

4/17/20 3.5 Edit 4<sup>th</sup> Doc. Demand (2.0), Tel. Conf. w/ H. Rhulen re:  
claims, strategy, and disclosure (.5), [REDACTED]  
[REDACTED]

4/18/20 4.0 Edit 4<sup>th</sup> Doc. Demand, draft 5<sup>th</sup> Doc. Demand, review related  
pleadings and related documents (4.0)

4/19/20 5.0 Edit 3<sup>rd</sup> interrogatories and 4<sup>th</sup> Doc. Demand, and review pleadings  
And related client documents (5.0)

4/20/20 3.6 Legal research re: notice to admit (.2), Tel. Conf. w/ H. Rhulen and  
S. Loughlin re: discovery demands (.2), Review plaintiff's  
discovery demands (1.0), Tel. Conf. w/ J. Satterfield re: discovery  
(.7), draft and edit 3<sup>rd</sup> interrogatories and 4<sup>th</sup> Doc. Demand and

Page 3

related e-mails w/ clients (1.5)

4/21/20	4.9	Review plaintiff's discovery demands and related Tel. Conf. w/ J. McFerrin-Clancy (1.4), [REDACTED] Draft 5 <sup>th</sup> Doc. Demand (2.0), Edit and Serve 3 <sup>rd</sup> Doc. Demand, 4 <sup>th</sup> Doc. Demand, and 3 <sup>rd</sup> Interrogatories (1.0)
4/22/20	4.6	Review answer to counterclaims and mark pleadings (1.0), Tel. Conf. w/ J. McFerrin-Clancy re: discovery and motion Strategy (.2), Tel. Confs. w/ H. Rhulen and J. Satterfield re: Discovery strategy (.9), Draft and edit 5 <sup>th</sup> Doc. Demand (2.5)
4/23/20	3.2	Tel. Conf. w/ H. Rhulen re: work for Rekor and motions (.7), Work on 5 <sup>th</sup> Doc. Demand and follow up on post-departure Rekor work (1.0), Edit 12 (c) motion and assemble SEC exhibits (1.5)
4/24/20	1.7	[REDACTED] Finalize and serve 5 <sup>th</sup> Doc. Demand (.4), Tel. Conf. w/ H. Rhulen and J. Satterfield re: work for Rekor and discovery (.4), Res. re: SEC Regs. Re: officer removal disclosure (.5)
4/25/20	3.0	Leg. Res. re: notices to admit, discovery of lit. hold letters, and summary judgment and fraud (3.0)
4/26/20	.6	Prepare 12 (c) motion (.3), Draft 6 <sup>th</sup> Doc. Demand (.3)
4/27/20	5.0	Draft 6 <sup>th</sup> Doc. Demand (3.0), Tel. Conf. w/ H. Rhulen re: Discovery and strategy (.5), Assemble and file 12 (c) motion (1.5)
4/28/20	3.5	Tel. conf. w/ S. Loughlin re: emails (NC), Edit 6 <sup>th</sup> Doc. Demand (3.0)
4/29/30	4.9	Tel. Confs. w/ H. Rhulen and J. Satterfield re: email deletion (1.6), Edit 6 <sup>th</sup> Doc. Demand (3.3)
4/30/20	<u>2.8</u>	Tel. Conf. w/ J. Satterfield re: Dropbox (NC), Draft email to J. Glatter re: extension of time and related Tel. Conf. w/ J. McFerrin-Clancy (.8), Finalize 6 <sup>th</sup> Doc. Demand (2.0)

Unchanged Hours — 63.0

— 7.5

— 1.0

**ROBERT C. BONEBERG, ESQUIRE**

43 Madison Avenue  
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6/1/2020

To: Suzanne Loughlin  
 Harry Rhulen  
 James Satterfield

Rekor Systems v Loughlin, et al.  
 Total Amount due: [REDACTED]

<u>Date</u>	<u>Time</u>	<u>Activity</u>
5/1/20	1.4	[REDACTED] [REDACTED] Leg. Res. re: Summary Judgment (.2), Research re: shareholder resolutions (.4), finalize and serve 6 <sup>th</sup> Doc. Demand (.3)
5/3/20	.5	Review Rekor document demands
5/4/20	1.0	Work on discovery issues (.5), Tel. Conf. w/ H. Rhulen re: claim strategy and disclosure (.5)
5/5/20	3.4	Tel. Conf. w/ H. Rhulen and S. Loughlin re: case strategy (1.0). Draft responses to Request to Admit (2.0), [REDACTED] [REDACTED]
5/6/20	7.2	Draft responses to Requests to Admit and related Tel. Conf. w/ J. Satterfield (3.9), Draft outline and Tel. Conf. w/ G. McCarthy (.5), Tel. Conf. w/ H. Rhulen and emails to clients re: State Court Claims (.5), Review Rekor email re: Fid. Duty and related legal Research (2.3)
5/7/20	2.8	Tel. Confs. w/ J. Satterfield and H. Rhulen re: disclosure, case Strategy, and witnesses (.8), Edit response to Notice to Produce (2.0)
5/8/20	3.2	Leg. Res. re: Corp. Fid. Duty (.7) and related Tel. Conf. w/ J. McFerrin-Clancy (.6) and draft and edit related email w/ K. Fleischman (.4), Draft and edit responses to Requests to Admit and transmit to J. McFerrin-Clancy (1.5)

Page 2

5/9/20	2.1	Tel. Conf. w/ H. Rhulen re: discovery (NC), Review Rekor Objections to discovery (2.1)
5/10/20	2.3	Leg. Res. re: Rule 34 (NC), Review Rekor discovery objections And Rekor discovery demands to respond to letter (2.3)
5/11/20	5.2	Tel. Conf. w/ C. Kumpf (1.0), Tel. Conf. w/ J. Russell (1.0), Draft and edit discovery letter to K. Fleischman (3.2)
5/12/20	2.7	Edit and send discovery letter to K. Fleischman (.4), Prepare C. Kumpf notes (.7), Edit interrogatory responses and responses to Requests to Admit (1.0), Tel. Conf. w/ J. McFerrin-Clancy re: Discovery (.6)
5/13/20	5.7	Edit responses to Requests to Admit and draft interrogatory Responses (5.0), Prepare Russel notes (.7). Tel. Conf. w/ J. McFerrin-Clancy re: discovery (NC), Tel. Conf. w/ H. Rhulen re: case strategy (NC)
5/14/20	5.2	Edit and send interrogatory responses and verification to clients (4.3) and related Tel. Conf. w/ H. Rhulen re: discovery issues (.7), Review Rekor documents response (.2)
5/15/20	2.5	Draft letter to Judge re: motion schedule and review related Documents (.7), Tel. Conf. w/ H. Rhulen re: case strategy (NC), Edit documents response (1.2), Tel. Conf. w/ H. Rhulen re: Case strategy (.6)
5/16/20	4.0	Edit interrogatory response (2.0), Tel. Conf. w/ H. Rhulen re: Doc. Response (1.4), Tel. Conf. w/ J. Satterfield re: discovery (NC), Tel. Conf. w/ S. Loughlin re: discovery (NC), Tel. Conf. w/ J. McFerrin-Clancy re: draft interrogatory responses (.6)
5/17/20	5.3	Edit Response to Requests to Admit (4.0), Tel. Conf. w/ J. McFerrin-Clancy re: discovery (.3), edit Doc. Response (1.0)
5/18/20	6.0	Edit Doc. Response (4.5), Review FBC letter and Interrogatory Response (.2), Tel. Conf. w/ J. Satterfield re: disclosure (.8), Tel. Conf. w/ H. Rhulen re: disclosure (.5)
5/19/20	4.4	Tel. Confs. w/ J. McFerrin-Clancy and opposing counsel re: discovery disputes and report to clients (1.4), Review Def. discovery demands, FBC letter, and draft response (3.0)

Page 3

5/20/20	2.0	Legal research re: summary judgment (.5), Tel. Conf. w/ H. Rhulen re: Ins. (NC), Edit interrogatory responses and S. Loughlin verification (.3), Tel. Conf. w/ H. Rhulen re: Disclosure (.4), Edit interrogatory responses (.8), Tel. Conf. w/ J. McFerrin-Clancy re: disclosure (NC)
5/21/20	1.0	Tel. Conf. w/ J. McFerrin-Clancy re: disclosure (NC), Review Response to 3 <sup>rd</sup> Doc. Demand and report to clients (.5), Edit stipulation of dismissal (.3), Emails w/ FBC re: Time extensions (.2)
5/22/20	2.5	Review letter to Judge re: extension of time (NC), Tel. Conf. w/ J. McFerrin-Clancy re: discovery (.4), Tel. Confs. w/ J. Satterfield re: franchises (.3), Edit responses to Requests to Admit and send to clients (1.5), Leg. Research re: summary judgment (.3)
5/23/20	1.7	Leg. Research re: summary judgment (1.3), Attention to discovery documents and related emails (.4)
5/26/20	2.5	Serve Disc. Responses and related Tel. Conf. w/ J. McFerrin-Clancy (1.0), [REDACTED]
5/27/20	2.9	Tel. Conf. w/ J. Squire re: facts (.9), [REDACTED]
5/28/20	.5	Review interrogatory responses (.2), Review 12 (c) opposition (.3)
5/29/30	4.0	Tel. Confs. w/ H. Rhulen and S. Loughlin re: Ins. Coverage and 12 (c) opposition (1.3), Review papers for 12 (c) reply (1.0), Leg. Research for 12 (c) reply (1.7), Edit 6 <sup>th</sup> Doc. Demand (3.3)
5/30/20	1.6	Leg. Research for 12 (c) reply (1.6)
5/31/20	<u>2.5</u>	Leg. Research for 12 (c) reply (2.5), Review Rekor Mem. and 2 <sup>nd</sup> Amended Complaint (1.0), Tel. Conf. w/ H. Rhulen re: due diligence activities

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[REDACTED]

Unchanged Hours - 78.9  
- 7.1

**ROBERT C. BONEBERG, ESQUIRE**

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7/2/2020

To: Suzanne Loughlin  
 Harry Rhulen  
 James Satterfield

Rekor Systems v Loughlin, et al.  
 Total Amount due: [REDACTED]

<u>Date</u>	<u>Time</u>	<u>Activity</u>
6/1/20	3.5	Tel. Conf. w/ H. Rhulen re: Ins. and case strategy (.5), Leg. Res. re: fraud v. contract claims (1.0), Review Docs. re: summary judgment and related emails w/ G. Silver, J. McFerrin-Clancy, and clients (2.0), Review clerk notice and corrected filings (NC)
6/2/20	1.5	Leg. Res. re: summary judgment (.5), Tel. Conf. w/ L. Satterfield re: financial statements (NC), Work on financial statement history, fraud v. contract, and summary judgment (1.0)
6/3/20	3.2	Tel. Conf. w/ clients re: financial statements, claims, and case Strategy (.9), work on summary judgment issues (.3), [REDACTED]
6/4/20	.4	[REDACTED]
6/5/20	1.1	Edit and transmit stipulation of dismissal (.3), Draft reply memorandum (.5), Tel. Conf. w/ J. McFerrin-Clancy re: case strategy (.3)
6/8/20	1.4	Draft Rule 56.1 Statement and work on summary judgment (1.0), Prepae Squire interview notes (.4)
6/9/20	6.0	Draft reply memorandum and related legal research (6.0)
6/10/20	5.8	Review Rekor Doc. Response and send to clients (.3), Draft reply memorandum and related legal research (5.5)
6/11/20	5.3	Tel. Conf. w/ J. McFerrin-Clancy re: case strategy and discovery (.8), draft reply memorandum (4.5)

Page 2

6/12/20	6.0	Email to K. Fleischman re: discovery issues (NC), draft and Edit reply memorandum and related legal research (6.0), Tel. Conf. w/ J. McFerrin-Clancy re: discovery issues (NC)
6/13/20	1.5	Review documents and draft disclosure letter to K. Fleischman (1.5)
6/14/20	2.0	Edit and reply memorandum to clients (.5), draft disclosure Letter to K. Fleischman (1.5)
6/15/20	1.5	Edit disclosure letter to K. Fleischman (1.5)
6/16/20	1.7	Edit and send K. Fleischman letter (1.5), Tel. Conf. w/ J. McFerrin-Clancy re: disclosure letter and issues (.2), Emails w/ Clients re; discovery letters and documents (NC)
6/17/20	4.1	Edit 12 (c) memorandum and related legal research (3.0), Review FBC letter and related documents and Tel. Conf. w/ J. McFerrin-Clancy (1.1)
6/18/20	4.6	Edit 12 (c) reply memorandum (3.0), Prepare for meet and confer, annotate FBC demand letter (1.0), Tel. Conf. w/ J. McFerrin-Clancy re: meet and confer (.6)
6/19/20	3.6	Preparation for and conduct meet and confer (2.7), and related Tel. Conf. w/ J. McFerrin-Clancy (NC), and reports to clients (.3), and Tel. Conf. w/ H. Rhulen (.3), Legal research for reply memorandum (.3) and edit reply memorandum (NC)
6/20/20	.7	Legal research re: summary judgment (.7), Edit 12 (C) Memorandum (NC)
6/21/20	1.5	Final edit and shepardize 12 (c) reply memorandum and send To J. McFerrin-Clancy (1.5)
6/22/20	3.0	Tel. Conf. w/ J. McFerrin-Clancy re: discovery (NC), Tel. Conf. w/ H. Rhulen and S. Loughlin re: discovery (1.7), Draft 4 <sup>th</sup> interrogatories (.7), Prepare for meet and confer (.4) Leg. Research re: summary judgment (.2), File 21 (c) memorandum (NC)
6/23/20	1.5	Prepare for and hold meet and confer, report to clients, and Related Tel. Conf. w/ J. McFerrin-Clancy (1.5)

Page 3

6/24/20	4.1	Hold discovery meet and confer (2.3) and related Tel. Conf. w/ J. McFerrin-Clancy (NC), and report to clients (NC), Legal research re: discovery rules (.3), Draft letter to court re: discovery (1.5)
6/25/20	1.2	Legal research re: discovery rules (.2) Draft and edit letter to Judge Re: discovery (1.0)
6/26/20	1.9	Tel. Conf. w/ J. Satterfield re: Dropbox (NC), Hold discovery meet and confer w/ FBS (1.9)
6/27/20	.8	Tel. Conf. w/ J. McFerrin-Clancy re: discovery (.5), [REDACTED] Conf. w/ H. Rhulen re: case strategy (NC)
6/28/20	5.0	Edit letter to Judge and related legal research and document review (2.0), [REDACTED]
6/29/20	4.6	Prepare for Russell and Ruffcorn interviews (.5), [REDACTED] [REDACTED], Edit Letter to Judge and related legal research and email w/ J. McFerrin-Clancy (3.0)
6/30/20	<u>2.2</u>	Tel. Conf. w/ W. Ruffcorn re: case facts, prepare notes and report To clients (1.7), Edit Liman letter and draft attachment (.5)

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[REDACTED]

Unchanged Hours - 412.1

- 30.8